

February 24, 2010

New Jersey Department of Environmental Protection
Bureau of Financing and Construction Permits
401 East State Street, 3rd Floor
Post Office Box 0425
Trenton, New Jersey 08625-0029

ATTENTION: Nicholas Horiates

SUBJECT: SCCC and Diamond Sites, Kearny, New Jersey
General Industrial – Treatment Works Approval (TWA)

RE: *Permit Application Submittal*

Dear Mr. Horiates:

This Submittal includes one (1) original of a General Industrial Treatment Works Approval completed Permit Application package required for the New Jersey Pollutant Discharge Elimination System (NJPDES)/Discharge to Surface Water Permit, Category BGR – General Remediation Clean-up Permit Authorization (BGR Permit) NJG0175102 for the Standard Chlorine Chemical Co., Inc. (SCCC) Site, Diamond Site, and a small portion of the adjoining Koppers Seaboard Site located in Kearny, New Jersey. The application is being submitted by Key Environmental, Inc. (KEY) on behalf of our clients, SCCC, Inc. and Tierra Solutions, Inc. who are required to implement the proposed surface water discharges to complete remediation on-site in accordance with schedules included in the NJDEP-approved Interim Remedial Action Work Plan (IRAW). The IRAW outlines the use of two treatment systems to be used during remediation: 1) Hydraulic Control Treatment System (HCTS); and 2) Temporary Construction Treatment System (TCTS).

Specifically, this submittal includes:

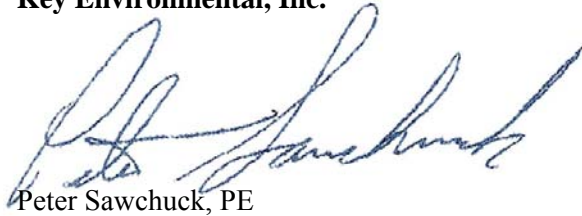
- A Treatment Works Approval Checklist for Administrative Completeness;
- Form TWA-1, Treatment Works Approval Permit Application, signed and sealed;
- Form DWR-175, Licensed Operator Grading Sheets;
- Form WFR-006GI, Engineer's Certification for General Industrial TWA Applications;
- Engineer's Abstract including:
 - ♦ Description of Waste Treatment Systems, including Engineer's Abstract Attachment A (Process & Instrumentation Diagrams for both the HCTS and TCTS);
 - ♦ The ultimate destination of all wastewater and residuals (Engineer's Abstract Attachment B);
 - ♦ Listing of all pollutants, including regular and intermittent flow which may enter the HCTS and TCTS (Engineer's Abstract Attachment B);
 - ♦ The Average and Peak Flow Requirements; and
 - ♦ The Expected Composition of Effluent from the Treatment Systems (Engineer's Abstract Attachment B).

- Statement of Consent Form WQM-003, signed and sealed;
- Application Fee for \$850 made payable to the “Treasurer, State of New Jersey, Environmental Services Fund”;
- Evidence of TWA Submission/Notification to the Town of Kearny, Town of Kearny Municipal Planning Board, and the Kearny Beautification and Environmental Commission;
- A Copy of a USGS Quadrangle Map with project sites clearly delineated;
- Final Plans and Profiles marked “FINAL”, each sheet signed and sealed by a New Jersey Professional Engineer (Final Plans and Profiles, Drawings TWA-01 thru TWA-09); and
- Construction Specifications signed and sealed by a New Jersey Professional Engineer.

Also included are copies of the General Remediation Cleanup (BGR) Permit Authorization, NJPDES #NJG0175102, and the Soil Conservation Service Certificate approval.

Thank you for your consideration in this matter. Should you have any questions please contact me at (908) 534-4501.

Sincerely,
Key Environmental, Inc.



Peter Sawchuck, PE
Vice President

Enclosure

General Industrial – Treatment Works Approval submittal

cc: Joseph D’Arco, Kearny Town Clerk
Margaret Kelly, SCCC
Enrique Castro, Tierra
Gerry Coscia, Langan
Mitch Brouman, Beazer
Mike Slenska, Beazer
Norman Guerra, Hudson County Improvement Authority
John Bolan, PS&S
Jim Zubrow, Key
Alan Briggs, Key